

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:)
)
In the matter of the Commission Rules) RM No. 11136
Regarding Technical Operation of AM)
Stations Operating in the Expanded Band)



To the Commission:

COMMENTS

Mullaney Engineering, Inc. (“MEI”), hereby submits its comments in response to the Public Notice released by the Commission on January 5, 2005, in RM No. 11136 (“RM”), which solicits comments concerning the petition for rule making filed by Intermarkt Broadcasting of Georgia, Rama Communications, and Multicultural Radio Broadcasting, Inc. That petition suggests multiple changes to the Commission’s Rules regarding the modification of AM expanded band authorizations. MEI’s comments relating to pertinent technical issues raised within the notice’s paragraphs are provided herein.

MEI agrees that additional power above the presently authorized 10 kW day and 1 kW night is needed for AM expanded band stations to compete with other existing stations. The expanded band frequencies (1610-1700 kHz) are the highest frequencies in the AM band and as such suffer the most attenuation. Had the initial proposal for the expanded band permitted higher powers it is believed that substantially more of the existing lower frequency AM stations may have considered requesting an initial allotment.

However, MEI wishes to caution the Commission not to totally remove all restrictions. Many interference problems currently existing in the traditional AM band are

the result of the use of multiple tower arrays which are difficult to maintain within licensed parameters and/or which have now deteriorated such that they are no longer operating within licensed parameters (many arrays have been thrown out of adjustment by urban clutter which is more prevalent at the higher expanded band frequencies). We believe the current policy to permit only “**simple**” directional arrays in the expanded band is a **good policy** for this new band. We believe arrays should be limited to no more than three (3) towers and that limits should be placed on the maximum suppression or maximum gain. Arrays which have an RSS to RMS ratio of less than 1.5 are generally considered to be relatively stable.

Conclusion: MEI hopes the Commission will review all of the comments submitted and will expeditiously publish and process an NPRM to revise the necessary rules.

Respectfully submitted,

MULLANEY ENGINEERING, INC.

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By:



John J. Mullaney
Mullaney Engineering, Inc.
9049 Shady Grove Court
Gaithersburg, MD 20877
[301] 921-0115
Mullaney@MullEngr.com

